

**REMARKS/ARGUMENTS**

Before this Amendment, claims 1-20 were present for examination. Claims 1 and 10 are amended. Claims 2 and 13-20 are canceled. Therefore, Claims 1 and 3-12 are present for examination. No new matter is added by these amendments. Applicant respectfully requests reconsideration of this application as amended.

**35 U.S.C. §102 Rejection, Anderson et al.**

The Office Action has initially rejected claims 1-12 under 35 U.S.C. §102(b) as allegedly being anticipated by the cited portions of Anderson *et al.* (U.S. Patent No. 6,232,880) (hereinafter "Anderson"). For a valid anticipation rejection, the Office must show that each and every limitation from the claims appears in a single prior art reference. Applicants believe claims 1 and 3-12 are not taught by Anderson. Therefore, Applicants believe that Claims 1 and 3-12 are allowable as amended and respectfully traverse this rejection.

For example, Anderson fails to teach a random time interval generator, as claimed in Claim 1. Claim 1 provides for "a random time interval generator coupled with said correction signal generator and wherein said second sequence of correction signals is applied in response to said random time interval generator."

The Office Action characterizes Anderson as allegedly teaching this limitation (Col. 7, ll. 54-56; Col. 8, ll. 15-22, 50-67). However, there is no mention in Anderson of a *random time interval generator*. In fact, cited portions of Anderson appear to teach only that application of a stimulus can be administered to *random sides* of an animal (Col. 7, ll. 54-56).

Applying stimuli to *random sides* is completely different from applying them in response to a *random time interval generator*. Further, Anderson does not disclose a random time interval generator as recited in Claim 1. Thus, Anderson does not teach "a random time

interval generator coupled with said correction signal generator and wherein said second sequence of correction signals is applied in response to said random time interval generator."

Because Anderson fails to teach these limitations, neither the independent claim (Claim 1) nor the dependent claims which depend therefrom (Claims 3-12) are anticipated. For at least these reasons, Applicants respectfully traverses this rejection.

Claim 12

Claim 12 has been amended merely to more accurately refer to the antecedent basis for the claim language. This amendment is not intended to narrow the claim.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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